

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183-MEM

CONCURRED MOTION TO PERMIT ADDITIONAL DISCOVERY

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. On May 19, 2020, a lawsuit was filed in the United States District Court for the Middle District of Pennsylvania captioned as “Michael Giangrieco v. Susquehanna County; Elizabeth Arnold; and Judith Herschel” docketed to 3:20-CV-817-JEJ (“the Giangrieco lawsuit”). A copy of the Giangrieco lawsuit is attached hereto and incorporated herein as **Exhibit A**.
2. The Giangrieco lawsuit makes allegations that are pertinent to this matter. See ¶ 14-19 of **Exhibit A**.
3. These allegations include, *inter alia*, the following:

- a. The County's insurance company preparing documents in response to an EEOC complaint filed by Stoud and another employee against the County which were false and inaccurate.
 - b. The County's insurance company being informed of the false statements and being told to change the same.
 - c. County employees being asked to lie regarding the EEOC complaint to protect Commissioner Arnold.
4. Based on the allegations in the Giangrieco lawsuit and its relevance to this matter, the parties request this Honorable Court grant permission to conduct additional discovery.
5. Additional discovery will consist of depositions of the following persons:
 - a. Michael Giangrieco, Esquire;
 - b. Mary Ann Warren;
 - c. Elizabeth Arnold;
 - d. Alan Hall; and
 - e. Jeanne Conklin;
6. The discovery to be conducted will not delay or affect the deadlines for motions *in limine* or the trial date set in this Court's Order of July 22, 2020 (Doc. 58).
7. Defense counsel concurs with this request.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court permit the additional discovery requested herein.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
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Date: July 27, 2020

CERTIFICATE OF CONCURRENCE

The undersigned hereby certifies that on July 24, 2020, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion. Attorney Hailstone gave his concurrence to the foregoing motion.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: July 27, 2020

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 27th day of July, 2020.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire